



ANDOVER TOWN COUNCIL

Unreasonable Complainant Behaviour Policy 2026

1. Purpose

Andover Town Council is committed to dealing with all complaints fairly, thoroughly and impartially under its Complaints Procedure and Policy. In a small number of cases, the conduct of a complainant, or the frequency or nature of their contact, can hinder the consideration of their complaint, place unreasonable demands on the Council's small staff team, or amount to harassment.

This policy sets out how the Council will identify and manage unreasonable and unreasonably persistent complainant behaviour, while ensuring that genuine complaints continue to be heard. It is based on guidance published by the Local Government and Social Care Ombudsman on managing unreasonable complainant behaviour.

2. Scope

This policy applies to complainants and other service users whose behaviour towards the Council, its staff or its councillors is unreasonable. It applies to contact by any channel: in person, by telephone, in writing, by email and via social media.

This policy does not apply to councillor conduct, which is governed by the Code of Conduct, and it does not replace the Complaints Procedure and Policy. A complaint is not unreasonable merely because it is made forcefully, is inconvenient, or is ultimately not upheld.

3. Unreasonable Behaviour

Unreasonable behaviour includes, but is not limited to:

- Aggressive, abusive, offensive, discriminatory or threatening language or behaviour towards staff or councillors.
- Making excessive demands on staff time, for example very frequent, lengthy or repetitive telephone calls, emails or visits, or expecting immediate responses.
- Refusing to accept a decision where the complaints procedure has been completed, and repeatedly raising the same or substantially similar complaint without new evidence.
- Refusing to specify the grounds of a complaint or to cooperate with the complaints process, while insisting that the complaint be determined.
- Changing the basis of the complaint as the investigation proceeds, or raising numerous unrelated matters at once and pursuing them all obsessively.

Version	Date	Minute Number	Approved by	Review Date
DRAFT 0.1	7 October 2026	PR 040/10/26	Policy and Resources	every three years, or sooner if legislation, national guidance or Council requirements change.
DRAFT 0.1	8 October 2026	C 237/10/26	Full Council	



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- Recording meetings or conversations covertly or without consent, or misrepresenting the Council's position publicly.

4. Deciding to Restrict Contact

Before any restriction is applied the Council will normally:

- Ensure the complaint itself is being, or has been, dealt with properly under the Complaints Procedure and Policy.
- Warn the complainant in writing that their behaviour is considered unreasonable, explain why, and explain what will happen if it continues.

If the behaviour continues, the Town Clerk will prepare a short report for the appropriate Committee recommending proportionate restrictions or, where the matter is urgent, will act in consultation with the Chair of that Committee under delegated authority. In cases of threats or violence, restrictions may be applied immediately without prior warning and the Police informed.

5. Restrictions Available

Restrictions will be tailored, proportionate and the minimum necessary. They may include:

- Limiting contact to a single named officer, a single channel (for example, in writing only), or set times and frequency.
- Requiring an appointment, or the presence of a second officer or councillor, for any meeting.
- Declining to respond to further correspondence about a closed complaint that raises no new material, while continuing to read and file it.
- In extreme cases, advising that correspondence will only be accepted from a third-party representative, or notifying the complainant that contact considered to amount to harassment will be reported to the Police.

6. Notification, Duration and Appeal

The complainant will be notified in writing of any restriction, the reasons for it, its duration (normally no more than 12 months in the first instance), the date on which it will be reviewed,

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and how to appeal. An appeal will be considered by councillors not previously involved in the decision. New complaints from a restricted complainant will be treated on their merits.

7. Recording and Monitoring

The Town Clerk will keep a record of all warnings and restrictions, the evidence supporting them and the review dates. An anonymised summary will be reported annually to the Policy and Resources Committee.

8. Responsibilities

Full Council

- Adopts this policy.

Policy and Resources Committee

- Decides on restrictions, reviews them, and hears appeals.

Town Clerk

- Issues warnings, maintains records, applies restrictions and supports affected staff.

9. Data Protection and Information Rights

Records held under this policy contain personal data and will be processed in accordance with the UK GDPR and the Data Protection Act 2018, and retained in line with the Records Retention and Disposal Policy. Nothing in this policy removes a person's statutory rights, including rights under the Freedom of Information Act 2000, although the Council may rely on statutory provisions concerning vexatious or repeated requests where they apply (section 14, Freedom of Information Act 2000).

Related Policies

This policy should be read alongside:

- Complaints Procedure and Policy
- Code of Conduct
- Dignity at Work Policy

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- Data Protection Policy and Procedure
- Freedom of Information Policy
- Records Retention and Disposal Policy

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